



November 25, 2006

Joe Cassmassi, Planning and Rules Manager
Planning, Rule Development and Area Sources
South Coast Air Quality Management District
21865 East Copley Drive
Diamond Bar, CA 91765

Subject: 2007 Draft Air Quality Management Plan Comments

Dear Mr. Cassmassi: *Joe*

Thank you for your support to help the Santa Clarita Valley improve air quality. We greatly appreciate the assistance the South Coast Air Quality Management District (SCAQMD) has provided the City of Santa Clarita in our fight to enhance the air quality in our community. The 2007 draft Air Quality Management Plan (AQMP) is an informative and detailed document which the City looks forward to working on with the SCAQMD.

As you know, the Santa Clarita Valley's air quality rests amongst the worst in the country and is being even further threatened by the proposed citing of a CEMEX mega-mine, *which would result in significant amounts of dust and emissions to be released into the air, exceeding the maximum risk allowed by the AQMD Toxic Rules for new sources by 250%.* It is for these reasons and others that the City of Santa Clarita has made every effort to work with the SCAQMD and participate, as possibly allowed, in the planning efforts and decisions made that impact the air we breathe.

We appreciate the efforts expended to bring the AQMP thus far and appreciate the opportunity to provide comments.

Ozone Precursors: Volatile Organic Compounds (VOCs)

We strongly support activities that will reduce the VOC content in consumer products. As these products will soon overcome mobile sources as primary VOC emissions source in Southern California, increasing the markets for these products is critically important. However, we strongly suggest that the SCAQMD work to synergize any VOC reduction efforts with existing green building programs. Specifically providing additional financial incentives through these existing



programs will be more effective in reducing VOC emissions than adding another layer of program to the green building field.

In addition, many local governments can help provide markets through their purchasing policies. It should be a control measure to help provide model purchasing policies for local governments to purchase emissions reducing products. This should be included on Table 7-1 on page 7-2.

Ozone Precursors: Oxides of Nitrogen

Unfortunately, combustion engines in heavy-duty diesel trucks, off-road equipment, ships, and commercial boats continue to contribute heavily to oxides of nitrogen (NOx). The NOx combining with VOCs are contributing significantly to the ozone pollution problem experienced in the Santa Clarita Valley and elsewhere in the SCAQMD region. As a result of the Clean Air Act and other governing rules, it may be necessary for the SCAQMD to "seek additional authority to adopt and implement cost-effective mobile source controls as necessary" to help control this ongoing source of air pollution. We strongly support the SCAQMD in this mission, once again acting in a leadership role for the betterment of our lungs. We would like to see additional support for rest stops, weigh stations, and other locations besides the ports to reduce the emissions from diesel trucks.

We highly recommend that the SCAQMD's staff assemble a list of the largest private fleet owners and work from that list to reduce these emissions, as well. We would like to see more funding available to provide infrastructure for alternative fueled vehicles that do not require matching dollars. In addition, we would like to see a more effective Clean Air Choice program implemented. We have had limited success in implementing this program. Restructuring the program and providing serious funding and staff support might provide incentives for the consumer of the vehicles in question.

Particulate Matter (PM) 2.5/10

With the addition of PM 2.5 to PM 10 in the AQMP, it is unclear what different strategies are going to be attempted for the different sizes of particulates. It may be that by controlling the smaller sizes, the SCAQMD will control the larger sizes of PM. However, the document is not clear on this. Please detail how these elements are handled, or will be handled, in rules and policy. Also, if there are control measures that will be used for one and not the other, please identify the measures as such.

It is not clear what "residential fuel combustion" means. If it is simply fireplaces, please simplify the language. If it is more than that, such as barbeques or trash burning, then please define it more completely. It will be important to understand the specific elements in order to make useful comments in dealing with the general public.

While we support the BCM 02, which calls for localized PM emission hot spots and customized control programs, there is not enough details to understand these programs. If this is of the level of the Sub Regional Plan, please outline that process as an example. If not, please provide an example of what types of issues and programs would be offered to communities. In either case, there should be a process for benchmarks, public process and input (which the SCAQMD has particular sensitivity and expertise), regular updates, and analysis to track progress.

We are concerned that the AQMP does not adequately address inter-media pollution problems from the affects of dust control chemicals that need to be considered for emission reductions. It has recently come to our attention that the most commonly utilized dust control chemical is a magnesium chloride based product. As a result of the significant water quality concerns in our watershed due to chlorides, it is anticipated non-chloride based stabilizers will become much more common in this area. The non-chloride based stabilizers produce highly toxic by-products, such as arsenic, lead, and mercury that are toxic to fish located in the Santa Clara River. The Santa Clara River watershed is 1,600 square miles and is home to several endangered fish species (i.e. unarmored three spine stickleback, arroyo chub, etc.) documented throughout this area. As a result, emissions inventory for the Santa Clarita Valley area has been under estimated and will contribute more locally than previously estimated.

We support the concept of accelerated engine retirement for heavy-duty diesel engines. This reduces both PM and NOx emissions. However, we would highly recommend that additional funding be available to local governments and local government contractors to help defray the costs of additional capital investments.

Green Building/Smart Growth Synergy

As stated previously, we suggest that the SCAQMD staff include a control measure to synergize and coordinate programs with the existing, and encourage new, green building incentive programs with local governments. The proposed

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energy efficiency, renewable energy, urban heat island reduction, and the previously mentioned VOCs reductions are all strategies that the SCAQMD will employ. They are also cornerstones of green building programs. By providing policy, financial, and staff support to local governments and builders the SCAQMD can increase the clean air programs outlined in the AQMP without adding another program layer.

The Southern California Association of Governments (SCAG) section did not include an analysis of their Transit Oriented Development policies. This organization has been focusing their efforts on Transit Oriented Development, to cluster high-density development near transit hubs for trains and buses. It did not appear that the analysis took this style of future development into consideration.

Local Land Use Decisions

We would like to see more details about the San Joaquin Valley Unified Air Pollution Control District approach included in the document to provide concrete examples of the SCAQMD's vision. It is unclear what the effort was or is, and how it worked with local governments. Also, given the fact that there are at least 200 different cities, three counties, and various regional planning agencies, having more details about this program is critical to making useful comments. It is highly recommended that staff work with the American Planning Association, the League of California Cities, and others in the crafting of this language. It is unclear from the language what would happen if a land use authority and the SCAQMD were in conflict (i.e. the local government approves the project despite significant air quality impacts). If the working group membership is limited, or how it's structured is unclear, the City would have concerns about this element. In general, we understand the need for this control measure, but need to balance the air quality need with maintaining local control over land use policy. Please clarify the language in this element.

I am grateful for SCAQMD's efforts to help reduce air pollution that affects the Santa Clarita Valley and the South Coast region. By working together, we can help protect the health of this community and others by helping to provide clean air for current and future generations.

Sincerely,


Ken Pulskamp
City Manager

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cc: City Councilmembers
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Michael Murphy, Intergovernmental Relations Officer
Travis Lange, Environmental Services Manager
Toi Chisom, Management Analyst
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Officer/Public Advisor, SCAQMD